

**UNITED STATES BANKRUPTCY COURT
WESTERN DISTRICT OF PENNSYLVANIA**

In re:

LANCE P. MCCULLOUGH and
JANELLE L. MCCULLOUGH

Debtor.

:
:
:
:
:
:
:
:
:

Bankr. Case No.: 12-23412-GLT

Chapter 13

**NAVIENT SOLUTIONS, LLC'S
CONSENTED MOTION TO CONTINUE HEARING
ON THE COURT'S ORDER FINDING NAVIENT SOLUTIONS, INC.
IN CONTEMPT AND THIRD ORDER TO SHOW CAUSE**

Navient Solutions, LLC f/k/a Navient Solutions, Inc. f/k/a Sallie Mae, Inc., ("Navient"), by and through its undersigned counsel, moves to continue the September 6, 2017, hearing on this Honorable Court's Order Finding Navient in Contempt of Court And Third Order to Show Cause, and states as follows:

1. Navient's foremost concern in this matter is to assure this Court that Navient intends no disrespect to this Court, nor to the Chapter 13 Trustee, nor to the debtor or debtor's counsel. Navient accepts responsibility for its errors in this matter.

2. Navient is prepared to appear at the hearing on the Court's Order to Show Cause, currently scheduled for September 6, 2017, at 9:00 am, but respectfully requests a continuance to the Court's next available date, October 4, 2017, at 10:30 am. As good cause therefor, Navient avers as follows:

3. Navient fully appreciates the significance of the Order to Show Cause. As such, it wishes to be represented by its lead counsel, Becket & Lee LLP, at the hearing on the Court's Order.

4. The undersigned, Alane A. Becket, Managing Partner of Becket & Lee LLP, is unavailable on September 6, attending a conference. The Chapter 13 Trustee, Ronda J. Winnecour is also unavailable on September 6.

5. Ms. Becket has personally spoken with both the Chapter 13 Trustee, Ronda J. Winnecour and the debtors' attorney, Donald R. Calaiaro, Esquire. Both have consented to the continuance of the hearing until October 4, 2017, at 10:30 am.

WHEREFORE, Navient Solutions, LLC respectfully requests that this Honorable Court continue its hearing currently scheduled for September 6, 2017, until October 4, 2017, at 10:30 am and for such other relief as is appropriate.

Respectfully submitted,

By: /s/ Allison L. Carr
Allison L. Carr (PA Bar No. 203815)
BERNSTEIN-BURKLEY, P.C.
Suite 2200 Gulf Tower
707 Grant Street
Pittsburgh, PA 15219
Telephone: (412) 456-8100
Facsimile: (412) 456-8135
E-mail: acarr@bernsteinlaw.com

By: /s/ Alane A. Becket
Alane A. Becket (PA Bar No. 65451)
Becket & Lee LLP
16 General Warren Blvd.
Malvern, PA 19355
Telephone: (610) 644-7800
Facsimile: (610) 993-8494
E-mail: abecket@becket-lee.com

Attorneys for Navient Solutions, LLC

By: /s/ Donald R. Calaiaro

Donald R. Calaiaro
Calaiaro Valencik
428 Forbes Ave., Suite 900
Pittsburgh, PA 15219
412-232-0930
Fax : 412-232-3858
Email: dcalaiaro@c-vlaw.com

Attorney for Debtors,
Lance P. McCullough and
Janelle L. McCullough

By: /s/ Ronda J. Winnecour

Ronda J. Winnecour PA ID #30399
CHAPTER 13 TRUSTEE WD PA
600 Grant Street
Suite 3250, US Steel Tower
Pittsburgh, PA 15219
(412) 471-5566
cmecf@chapter13trusteedpa.com